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6 Attorney for Defendant
7 HEATHER ROMOSER

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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

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12 UNITED STATES OF AMERICA,) No. 2:21-cr-00110-DAD-5
13 Plaintiff,)
14 v.) **STIPULATION AND ORDER FOR
15 Heather Romoser,) MODIFICATION OF CONDITIONS OF
16 Defendant.) PRETRIAL RELEASE**
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17 Defendant, HEATHER ROMOSER, by and through her counsel of record, TONI
18 WHITE, and the GOVERNMENT hereby stipulate as follows:

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20 1. On January 26, 2022, Ms. Romoser was ordered released on bond with special
21 conditions including a 90 day residential drug treatment program at Wellspace
22 Residential Drug Treatment program. (ECF DOC #79).

23 2. Special condition numbers 16, 17 and 18 of Ms. Romoser's special conditions of
24 release (ECF DOC #80) subjected Ms. Romoser to location monitoring upon her
25 release from Wellspace.

26 3. Ms. Romoser is being supervised in Idaho by Pretrial Services. Both her pretrial
27 officer in Idaho, Joel Osborne, and Sacramento, Darryl Walker, are amenable to the
28 removal of Ms. Romoser's location monitoring.

1 4. Pretrial services officer Osborne reports as follows:

2 She [Ms. Romoser] has been in full compliance since her placement on pretrial
3 supervision approximately six months ago. She abides by her curfew, in fact, she is
4 usually home several hours before her curfew. Most of the time she is home with her
5 parents when she is not at work. She is employed full-time and is enrolled in
6 treatment. According to her counselor, she is consistent with attendance and is
7 engaged. She has consistently attended drug testing without submitting any positive
8 tests.

9 We like to prioritize location monitoring technology and utilize it for individuals who
10 present significant risk factors, as location monitoring cases are very time consuming
11 for the officer. Currently, she is not exhibiting any risk factors, such as criminal
12 activity, drug use, or flight. It's not necessarily interfering with anything in her life,
13 other than it's expensive and uncomfortable. Yes, in a way it is a reward for her
14 compliance, but I believe the potential removal of the device has given her incentive
15 to do well.

16 5. Aaron Pennekamp, counsel for the Government, has been advised of the proposed
17 removal of location monitoring and has no objection.

18 By this stipulation, Ms. Romoser now moves to have special conditions #16, 17 and 18
19 removed.

20 IT IS SO STIPULATED.

21 Dated: December 6, 2022

22 McGregor Scott
23 United States Attorney

24 By: /s/ Aaron Pennekamp
25 Aaron Pennekamp
26 Assistant U.S. Attorney

27 For the United States

28 Dated: December 6, 2022

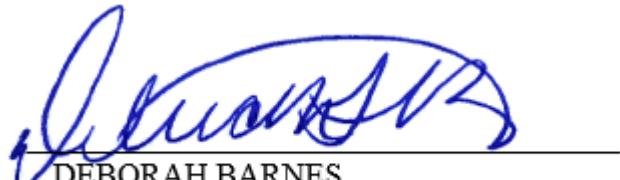
29 By: /s/ Toni White
30 TONI WHITE

31 For Defendant Heather Romoser

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2 **O R D E R**
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5 IT IS SO FOUND AND ORDERED.
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8 Dated: December 11, 2022
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13 DEBORAH BARNES
14 UNITED STATES MAGISTRATE JUDGE
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